



society.”<sup>1</sup> Defendant meets this definition—a small group (Defendant’s employees and radio listeners) devoted to a person (Dave Ramsey and other Ramsey personalities), idea (living debt free based on biblical principles), or philosophy (the “Baby Steps,” tenets of Financial Peace University, and “traditional Judeo-Christian values”).

Defendants are welcome to argue they are not a cult of course, but the accusations of Plaintiff are what they are. Defendant – through their own admissions- runs their business like a cult, requiring employees to journal their thoughts on Dave and his teachings, recount their “Dave Story,” visit the museum of Mr. Ramsey’s life, go through an onboarding process to re-educate themselves to be compliant with Defendant’s thinking and beliefs, and again through the admission of numerous of Defendant’s employees – terminates employees who do not comply with those religious beliefs. The word “cult” describes exactly what Plaintiff claims Defendant is and forcing the cult-like beliefs on their employees.

Whether Defendant behaves like a cult is close to the heart of this matter and cannot be considered a side issue. The risk of prejudice is minimal, especially given how the injury to Plaintiff came in relation to and as a result of Defendant’s cult-like beliefs and actions. (*See Lindsley v. TRT Holdings Inc.*, No. 3:17-CV-2942-X, 2023 WL 11983791, at \*2 (N.D. Tex. Mar. 6, 2023) (“Defendants aver that psychological records will show that Lindsley's emotional distress is partly attributable to abuse she experienced as a child through her parents’ involvement in a cult. Any prejudicial effect of this testimony does not substantially outweigh its probative value.”))

Further, limiting discussion of Defendant’s cult-like nature and activities would deny Plaintiff the full breadth of Title VII’s definition of religion: “all aspects of religious observance and practice, as well as belief, unless an employer demonstrates that he is unable to reasonably

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<sup>1</sup> Exhibit 1

accommodate ... [the] religious observance or practice without undue hardship on the conduct of the employer's business.” 42 U.S.C. § 2000e(j). Plaintiff should be allowed to discuss “all aspects” of his religious observance, practice, and belief, including how Defendant’s practices resembled a cult to which he did not wish to belong.

For the above reasons, Plaintiff respectfully moves the Court to deny Defendant’s sixth Motion in Limine relative to testimony or statements about Defendant being a cult or cult-like.

Respectfully Submitted,

**THE EMPLOYMENT AND COMMERCE  
LAW GROUP,**

**/s/ Jonathan A. Street**

**JONATHAN A. STREET, BPR No. 027172**

**G. BRANDON HALL, BPR No. 034027**

**ZACHARY W. BROWN, BPR No. 037509**

1625 Broadway, Suite 601

Nashville, TN 37203

(615) 850-0632

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the above and foregoing was served electronically via the Court's CM/ECF system this 30th day of July, 2025 to the following:

Leslie Goff Sanders (TN #18973)

Daniel C. Crowell (TN #31485)

Stephen C. Stovall (TN #37002)

Eric C. Lyons (TN #36105)

Molli A. Guinn (TN # 41258)

BARTON LLP

611 Commerce Street, Suite 2911

Nashville, TN 37203

Tel.: (615) 340-6790

*Attorneys for Defendant*

/s/ Jonathan A. Street

Jonathan A. Street